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FILED
DISTRICT COURT OF GUAM

JAN 23 2008

JEANNE G. QUINATA
Clerk of Court

Attorneys for the United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,	}	CRIMINAL CASE NO. <u>06-00104</u>
Plaintiff,		SUPERSEDING INDICTMENT
vs.		CRIMINAL CONSPIRACY
MYUNG SUG KIM,		[18 U.S.C. §§ 2 & 371]
Defendant.	}	FRAUD IN CONNECTION WITH
		IDENTIFICATION DOCUMENTS
		[18 U.S.C. §§ 2; 1028(a)(1); 1028(b)(1)(A)(ii)
		& 1028(c)(3)(A)]

THE GRAND JURY CHARGES:

COUNT I - CRIMINAL CONSPIRACY

On or about December 9, 2004, within the District of Guam, the defendant herein, MYUNG SUG KIM, did willfully and knowingly combine, conspire, confederate and agree with Eun Young Lee and others, both known and unknown to the Grand Jury, to commit the offense of Fraud in Connection with Identification Documents, in violation of Title 18, United States Code, Section 1028(a)(1), and to aid, abet, counsel, command, induce and procure the conspiracy charged in this count and willfully cause others to perform acts and make statements in furtherance of the conspiracy, and did perform at least an overt act for the purpose of carrying out

1 the conspiracy, to-wit: the submission of an application for a Guam driver's license, said
2 application bearing a false Taxpayer Identification Number (TIN) 963-71-8820,

3 ALL IN VIOLATION OF Title 18, United States Code, Sections 2 and 371.

4 **COUNT II - FRAUD IN CONNECTION WITH IDENTIFICATION DOCUMENT**

5 On or about December 9, 2004, in the District of Guam, the defendant herein, MYUNG
6 SUG KIM, did knowingly and without lawful authority produce an identification document,
7 authentication feature and false identification document, to-wit: a Guam driver's license #
8 1228106732, by means of a false Internal Revenue Service Taxpayer Identification Number
9 (TIN) 963-71-8820, and the production of said driver's license was in and affected interstate and
10 foreign commerce.

11 ALL IN VIOLATION of Title 18, United States Code, Sections 2, 1028(a)(1),
12 1028(b)(1)(A)(ii) and 1028(c)(3)(A).

13 DATED this 23rd day of JANUARY 2006.

14 A TRUE BILL.

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18 LEONARDO M. RAPADAS
19 United States Attorney
Districts of Guam and NMI

REDACTED

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21 By: Karon V. Johnson

22 KARON V. JOHNSON
Assistant U.S. Attorney

23 Reviewed:

24
25 By: Jeffrey J. Strand For U.S.

26 JEFFREY J. STRAND
First Assistant U.S. Attorney